

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No.
)	
TRAMAINE I. SLAUGHTER,)	
)	
Defendant.)	

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

1. At all times relevant to this Indictment, Defendant **TRAMAINE I. SLAUGHTER** was an individual residing in the Birmingham, Alabama area, within the Northern District of Alabama.

2. At all times relevant to this Indictment, B.D.U. was a federally licensed firearms dealer with a physical address in Gainesville, Florida, and internet servers located outside the state of Alabama.

3. At all times relevant to this Indictment, an “Federal Form 4473” is a Firearms Transaction Record prescribed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives that is required to be completed when a person proposes to purchase or transfer a firearm from a federally licensed firearms dealer.

COUNTS ONE through FOURTEEN
Wire Fraud
[18 U.S.C. § 1343]

4. The Grand Jury adopts and incorporates paragraphs One through Three of the Introduction as if specifically stated herein.

NATURE AND PURPOSE OF THE SCHEME TO DEFRAUD

5. Beginning on or about February 28, 2021, and continuing thereafter up to at least May 12, 2021, in the Northern District of Alabama and elsewhere, Defendant,

TRAMAINE I. SLAUGHTER,

did knowingly and with intent to defraud, devise and intend to devise, and attempt to devise, a scheme and artifice to defraud, and for obtaining money and property by means of material false and fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, writings, signs, signals, or sounds by means of wire communications, to wit: purchases or attempted purchases, by use of the internet, from a federally licensed firearm dealer, using unauthorized credit cards and credit cards issued to another person or persons, in violation of Title 18, United States Code, Section 1343.

THE SCHEME AND ARTIFICE

6. Between February and May 2021, Defendant **SLAUGHTER** made or attempted to make several online purchases from B.D.U., a federally licensed firearms dealer with a physical address in Gainesville, Florida and internet servers located outside the state of Alabama.

7. It was Defendant **SLAUGHTER'S** goal in executing the scheme and artifice to defraud to purchase and obtain firearms, ammunition, and/or firearms accessories from B.D.U. by fraudulent means, through the use of unauthorized credit cards and credit cards issued to other persons, and for which Defendant **SLAUGHTER** did not have authorization to use.

THE WIRE COMMUNICATIONS

8. In furtherance of the scheme and artifice to defraud, on or about the dates listed below, each such date constituting a separate count of the Indictment against the Defendant, Defendant **SLAUGHTER** transmitted and caused to be transmitted and attempted to transmit in interstate commerce, by means of a wire communication, certain signs, signals, and communications, that is, Defendant **SLAUGHTER** caused an interstate wire communication between Alabama and another state to be made as described below, for each Count:

COUNT	DATE	AMOUNT	DESCRIPTION
1.	3/25/2021	783.81	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to J.Y.
2.	3/25/2021	\$736.70	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to J.Y.
3.	3/26/2021	\$1,347.88	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to D.B.
4.	3/26/2021	\$96.92	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to D.B.
5.	3/26/2021	\$323.99	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to D.B.
6.	3/26/2021	\$889.90	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to D.B.
7.	3/28/2021	\$1,486.40	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to R.D.
8.	3/29/2021	\$1,042.90	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to D.B.
9.	4/5/2021	\$840.73	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to E.T.

10.	4/5/2021	\$962.32	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to E.T.
11.	4/5/2021	\$524.74	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to E.T.
12.	4/6/2021	\$1,319.32	Online purchase of firearms, ammunitions, and/or firearms accessories with credit card belonging to E.T.
13.	4/6/2021	\$1,418.26	Online purchase of firearms, ammunition, and/or firearms accessories with credit card belonging to D.B.
14.	4/6/2021	\$1,172.15	Online purchase of firearms, ammunition, and/or firearms accessories with credit card belonging to D.B.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FIFTEEN
False Statement During Purchase of Firearm
[18 U.S.C. § 924(a)(1)(A)]

On or about the 31st day of March, 2021, in the Northern District of Alabama,
Defendant,

TRAMAIN I. SLAUGHTER,

knowingly made a false statement and representation to Birmingham Pistol Wholesale, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Birmingham

Pistol Wholesale, in that Defendant **SLAUGHTER** knowingly did execute a Federal Form 4473 and listed an address as his residence, when he did not, in fact, reside at the address he provided, in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT SIXTEEN
False Statement During Purchase of Firearm
[18 U.S.C. § 924(a)(1)(A)]

On or about the 5th day of April, 2021, in the Northern District of Alabama,
Defendant,

TRAMAINE I. SLAUGHTER,

knowingly made a false statement and representation to Pleasant Grove Gun Supply, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Pleasant Grove Gun Supply, in that Defendant **SLAUGHTER** knowingly did execute a Federal Form 4473 and listed an address as his residence, when he did not, in fact, reside at the address he provided, in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT SEVENTEEN
False Statement During Purchase of Firearm
[18 U.S.C. § 924(a)(1)(A)]

On or about the 8th day of April, 2021, in the Northern District of Alabama,
Defendant,

TRAMAINE I. SLAUGHTER,

knowingly made a false statement and representation to Pleasant Grove Gun Supply, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Pleasant Grove Gun Supply, in that Defendant **SLAUGHTER** knowingly did execute a Federal Form 4473 and listed an address as his residence, when he did not, in fact, reside at the address he provided, in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT EIGHTEEN
False Statement During Purchase of Firearm
[18 U.S.C. § 924(a)(1)(A)]

On or about the 14th day of April, 2021, in the Northern District of Alabama,
Defendant,

TRAMAINE I. SLAUGHTER,

knowingly made a false statement and representation to FOP Range, Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,

with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of FOP Range, Inc., in that Defendant **SLAUGHTER** knowingly did execute a Federal Form 4473 and listed an address as his residence, when he did not, in fact, reside at the address he provided, in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT NINETEEN

**Shipping, Transport, or Receipt of Firearm With Intent to Commit Felony
[18 U.S.C. § 924(b)]**

On or about April 8, 2021, in the Northern District of Alabama, Defendant,

TRAMAINE I. SLAUGHTER,

did ship, transport, and receive a firearm in interstate commerce with an intent to commit an offense therewith punishable by imprisonment for a term exceeding one year, and with knowledge and reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year was to be committed therewith, all in violation of Title 18, United States Code, Section 924(b).

FIRST NOTICE OF FORFEITURE

[Forfeiture – 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A) and 28 U.S.C. § 2461(c)]

1. The allegations of Counts One through Fourteen of the Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A) and Title 28, United States Code, Section 2461(c).

2. Pursuant to Rule 32.2(a) of the *Federal Rules of Criminal Procedure* and Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), Defendant,

TRAMAIN L. SLAUGHTER,

upon conviction of the offense in violation of Title 18, United States Code, Section 1343 set forth in Counts One through Fourteen of this Indictment, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(c), 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), any property, real or personal, that constitutes or is derived from, directly or indirectly, proceeds traceable to the commission of the said violations, including, but not limited to, the following:

JUDGMENT FOR PROCEEDS

A sum of money equal to at least \$12,946.02, in United States currency, representing the value of the firearms, ammunition, and firearms accessories that were purchased in connection with the offenses alleged.

3. If any of the above-described forfeitable property, as a result of any act or omission of Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

The United States shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in accordance with Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(A), and Title 28, United States Code, Section 2461, and Rule 32.2 of the *Federal Rules of Criminal Procedure*.

SECOND NOTICE OF FORFEITURE
[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

1. The allegations contained in Counts One through Nineteen of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offenses charged in Counts One through Nineteen, Defendant,

TRAMAIN L. SLAUGHTER,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms, magazines, and ammunition involved in or used in the commission of the offenses, including, but not limited to, the following property:

- a. Troy A3 AR-style pistol, S/N: F11199754
- b. CZ Shadow 2 Black & Blue pistol, S/N: E063125
- c. KE Arms, Complete Lower Receiver, S/N: KF15173
- d. Smith & Wesson, M&P 2.0 pistol, S/N: NJN0549

- e. FN Scar 20s, S/N: PR20320
- f. Glock 17, Gen 3, 9mm caliber pistol, S/N: AFKB010
- g. FN, model 57, 5.7x28 pistol, S/N: 386400733
- h. Zev Tech, Z9, 9mm pistol, S/N: ZA04371
- i. Blue Line, MP-40, 22 LR pistol, S/N: BL77530
- j. Ruger AR 5.56/.223, M-LOK, Dark earth
- k. Diamondback DB15, 5.56x45mm Nato
- l. CZ Shadow 2 Urban Grey pistol
- m. Wolf Performance 7.62x39 ammunition
- n. Wolf Performance .223 Rem. Ammunition
- o. Colt M4 Carbine 5.56x45mm Nato rifle
- p. CZ- USA, Scorpion EVO 3 S1 9mm pistol
- q. Smith & Wesson, M&P 15 Sport, 5.56 Nato rifle
- r. Armalite M-15, .223 rifle
- s. Zastava USA, ZPAP92 pistol

3. If any of the above-described forfeitable property, as a result of any act or omission of Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

The United States shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461, and Rule 32.2 of the *Federal Rules of Criminal Procedure*.

A TRUE BILL.

/s/ electronic signature
GRAND JURY FOREPERSON

PRIM F. ESCALONA
United States Attorney

/s/ electronic signature
CATHERINE L. CROSBY
Assistant United States Attorney

/s/ electronic signature
RYAN RUMMAGE
Assistant United States Attorney